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6 Attorney for Debtor

7 IN THE UNITED STATES BANKRUPTCY COURT
8 FOR THE DISTRICT OF OREGON

9 In Re
10 Danielle Lee Wait,

11 Debtor.

)
) Case No. 15-33254 rld7
)
) REQUEST FOR HEARING ON TRUSTEE'S
) OBJECTION TO CLAIMED EXEMPTIONS
)

12 In response to the trustee's objection to the exemptions at no. 1 of his objection (1994
13 Chevy Blazer), debtor represents as follows: it is debtor's intention to file amended Schedule
14 B and C to address the objection.

15 In response to the trustee's objection to the exemptions at no. 2 of his objection
16 (discrimination lawsuit v. Cal-Am Properties), debtor represents as follows: she has not
17 actually received any damages for her claim against the named defendant; she may never
18 receive any such damages; and, if she does eventually recover for her damages, she does not
19 know, with any degree of certainty, what the nature of the award will be. Therefore, there is
20 no purpose in litigating the validity of a potential exemption at the present time. However,
21 debtor does believe that, based upon the nature of her claim in her lawsuit, the exemption
22 available to her under 11 U.S.C. §522 (d)(11)(D) may well cover some of any potential
23 award to her and so she is requesting a hearing to preserve that issue.

24 /s/ Gary L. Schultz
25 Gary L. Schultz OSB #801041
26 Attorney for Debtor